

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSEPH JACKSON,

Plaintiff,

Case No.: 18-CV-3007

NASSAU COUNTY; THE INCORPORATED VILLAGE
OF FREEPORT; DETECTIVE ROBERT DEMPSEY;
DETECTIVE GARY ABBONDANDELO; DETECTIVE
JOHN M. HOLLAND; DETECTIVE MICHAEL HERTS;
DETECTIVE MARTIN ALGER; DETECTIVE
ANTHONY SORRENTINO; DETECTIVE DAVID L.
ZIMMER; POLICE OFFICER MELENDEZ;
LIEUTENANT BURDETTE; SERGEANT MCHALE;
SERGEANT NOLL; DETECTIVE SHARKEY; POLICE
OFFICER DOWDELL; POLICE OFFICER BARRY
MCGOVERN; DETECTIVE TURNER; DETECTIVE
EDWARD HAGGERTY; POLICE OFFICER HALL;
DETECTIVE LAURETTE KEMP; DETECTIVE
WILLIAM TWEEDY; DETECTIVE ANTHONY KOSIER;
DETECTIVE SERGEANT DAN SEVERIN; DETECTIVE
JERL MULLEN; THE ESTATE OF DETECTIVE JERL
MULLEN; JOHN DOE, AS THE ADMINISTRATOR OF
THE ESTATE OF JERL MULLEN, and JOHN and JANE
DOE 1 through 20,

Defendants.

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PLEASE TAKE NOTICE that, upon annexed declaration of Keith M. Corbett, dated May 9, 2019, the affidavit of Defendant Detective Edward Haggerty, dated May 9, 2019, and the affidavit of Miguel Bermudez, dated May 9, 2019, the Defendants The Incorporated Village of Freeport, Detective David L. Zimmer, Police Officer Melendez, Lieutenant Burdette, Sergeant McHale, Sergeant Noll, Police Officer Barry McGovern, Detective Turner, Detective Edward Haggerty, Detective Sharkey, Detective Jerl Mullen, and Police Officer Hall (hereinafter “Village Defendants”), will move this Court, before the Honorable Joanne Seybert, United States District Judge, at the United States Courthouse, 100 Federal Plaza, Central Islip, New York

11722, on June 28, 2019, or on any such date as this Court may determine, for an Order dismissing Plaintiff Joseph Jackson's ("Plaintiff") Amended Complaint against the Village Defendants with prejudice pursuant to Rule 12(b)(5) and (6) of the Federal Rules of Civil Procedure, dismissing all claims and all Village Defendants from this action. The Village Defendants further respectfully request such other and further relief that the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that the Village Defendants respectfully request oral argument.

Dated: Uniondale, New York
May 9, 2019

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/ Keith M. Corbett
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